



ROBBINS RESEARCH INTERNATIONAL, INC.

Sunil G Moorjani

National Account Representative

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(619) 535-9900

1-800-445-8183, Ext. 6523

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9191 Towne Centre Drive

Suite 600

San Diego, CA 92122

The Opportunity Questions

1. What am I most **excited** about today?
2. How can I go the “**extra mile**” for someone today?
3. What am I **reading** or **listening** to today that will enlighten me?
4. How can I **exercise** today to create greater energy?
5. Do I want to ignore these questions and suffer the consequences later?





PROCOPIO
525 B Street
Suite 2200
San Diego, CA 92101
T. 619.238.1900
F. 619.235.0398

ZAGROS S. BASSIRIAN
P. 619.906.5759
zag.bassirian@procopio.com

DEL MAR HEIGHTS
LAS VEGAS
ORANGE COUNTY
PHOENIX
SAN DIEGO
SILICON VALLEY

September 21, 2021

VIA U.S. MAIL AND E-MAIL

Re: *Moorjani v. Moorjani, et al.*
San Diego Superior Court Case No.: 37-2021-00033119-CU-OR-CTL
Meet and Confer re Demurrer

Dear Mr. Moorjani:

As you know, our office represents Zubeida Moorjani, Gulab Moorjani, Sunil Moorjani, and Seema Moorjani in the above-referenced lawsuit.¹ Our understanding is you are representing yourself in this matter. If that changes at any time please let us know right away so we can communicate with your attorney directly. Pursuant to Code of Civil Procedure § 430.41, we send this in advance of our required meet and confer before we file our intended demurrer to your Complaint. Code of Civil Procedure § 430.41(a)(1) provides:

As part of the meet and confer process, the demurring party shall identify all of the specific causes of action that it believes are subject to demurrer and identify with legal support the basis of the deficiencies. The party who filed the complaint...shall provide legal support for its position that the pleading is legally sufficient or, in the alternative, how the complaint...could be amended to cure any legal insufficiency.

(Code Civ. Proc., § 430.41(a)(1).)

¹ Given that the parties share the same last name we will refer to individuals by their first name. No disrespect is intended.

1. The Complaint

The Complaint asserts three causes of action: (1) Quiet Title; (2) Cancellation of Instrument; and (3) Partition and Forced Sale.

The relevant allegations in the Complaint are: (i) you held title and interest in 6323 Caminito del Cervato, San Diego, CA 92111 (the “Caminito Residence”) (Complaint, ¶ 13); (ii) you hold title and interest in 11881 Cypress Valley Drive (the “Cypress Residence”) (*Id.*); (iii) real estate records should reflect the title owners of the Caminito Residence as you, your father, mother, and brother (¶ 15); and you and your brother are joint tenants of the Cypress Residence and you trace your title to a source common to the chains of title of “plaintiff and defendant.” (*Id.*, ¶ 37.)

You also seek to void the Quitclaim Deed, Doc# 2008-0661412 (the “December 2008 Quitclaim Deed”) on the basis that your parents did not have the competence to execute the document, that Sunil and Seema induced your parents to execute the December 2008 Quitclaim Deed, and that your parents will be deprived of title and possession of the Cypress Residence if the deed is not cancelled. (Complaint, ¶¶ 59, 61, 63.) Finally, you seek a partition and forced sale of the Cypress Property given the competing interests between multiple parties. (*Id.*, ¶ 67.)

2. The Law

A party may demur if a complaint fails to state facts sufficient to constitute a cause of action, or one or more cause(s) of action are uncertain. (Code Civ. Proc. § 430.10(e).) A complaint fails to state a cause of action if the cause of action alleged does not lie and no cause of action on any theory is stated. (*Otworth v. Southern Pac. Transportation Co.* (1985) 166 Cal.App.3d 452, 461.) The Court is authorized to consider any matter which the Court must or may judicially notice under Evidence Code §§ 451 or 452. (Code Civ. Proc., § 430.30(a).)

a. Quiet Title

Quiet title claims are governed by Code of Civil Procedure § 761.020, which provides that a complaint “shall be verified,” and it must describe (1) the property, (2) the basis of plaintiff’s title, (3) the adverse claims to plaintiff’s title, (4) the date as of which the determination is sought, and (5) a prayer for giving superior title to plaintiff against the adverse claims. (Code Civ. Proc., § 761.020.)

First, the all of the allegations in the Complaint are asserted on information and belief, and the “verification” is also based on information and belief. “I, Deepak Moorjani, hereby verify that the statements set forth in the foregoing Complaint are true and correct to the best of my knowledge, information and belief.” When a plaintiff verifies a complaint, it constitutes an oath that each allegation is true *except* as to matters alleged therein on information and belief. (Code Civ. Proc., 446.) The usual language is “that the same is true of his or her own knowledge, except as to the matters which are therein stated on his or her information and belief, and as to those matters that he or she believes it to be true.” To qualify as a verification, it must also contain the language specified by Code of Civil Procedure § 2015.5: “I certify (or declare) under penalty of perjury that the foregoing is true and correct.” This language is absent from the Complaint. Additionally, plaintiffs may not allege facts on information and belief where they have reason to know them directly. For example, matters the

plaintiff has constructive knowledge of, e.g., facts ascertainable from public records. (*Searcy v. Hemet Unified School Dist.* (1986) 177 Cal.App.3d 792, 802.)

To prevail on a quiet title claim, a plaintiff must establish title to the property in dispute. (*Thompson v. Loane* (2017) 11 Cal.App.5th 1180, 1195.) It follows that absent an interest in the property, a party has no standing to ask the court to quiet title in the property or to obtain damages for the cloud on title. An action to cancel a trustee's deed or other instrument purportedly transferring title is no different. "One without any title or interest in the property cannot maintain such an action." (*Chao Fu, Inc. v. Chen* (2012) 206 Cal.App.4th 48, 59.)

We have reviewed the deeds for both properties, and the Court may take judicial notice of those documents pursuant to Evidence Code § 452 in ruling on a demurrer. In short, you were never listed as a holder of title on any deed related to the properties at issue.

- On March 2, 1992, your parents took title to the Caminito Residence as joint tenants. (Exhibit A.)
- On October 13, 1999, a quitclaim deed was recorded whereby your parents and Sunil took title to the Caminito Residence as joint tenants. (Exhibit B.)
- On September 25, 2008, the sellers of the Cypress Property transferred title to Sunil and Seema as their community property. (Exhibit C.)
- On December 31, 2008, the December 2008 Quitclaim Deed was recorded whereby Sunil and Seema and your parents took title to the Cypress Residence as joint tenants. (Exhibit D.)

In other words, and contrary to the "verified" allegations in the Complaint, public records establish you never held title and interest in either property. Thus, you lack standing to bring the quiet title cause of action and this claim fails as a matter of law.

b. Cancellation of Written Instrument

The Complaint seeks to invalidate the December 2008 Quitclaim Deed. In addition to having no standing to assert this claim (*Chao Fu, Inc., supra*, at 59), the Complaint must show the plaintiff will be injured or prejudiced if the instrument is not cancelled and that such instrument is void or voidable. (*Santana v. BSI Financial Services, Inc.* (S.D. Cal. 2020) 495 F.Supp.3d 926, 950.) Plaintiffs must provide facts, "not mere conclusions, showing the apparent validity of the instrument designated, and point out the reason for asserting that it is actually invalid." (*Ephraim v. Metropolitan Trust Co. of California* (1946) 28 Cal. 2d 824, 833.) Here, the Complaint alleges that if the deed is not cancelled, your parents will be deprived of title and possession, and that your mother requires access to her property. This is insufficient. It is also based on an incorrect premise. If the December 2008 Quitclaim Deed is cancelled, your parents would no longer be holders of title to the Cypress Property at all. Accordingly, this claim fails as a matter of law.

c. Partition and Forced Sale

Partition is the procedure for segregating and terminating common interests in the same parcel of property. The process does not involve a transfer of title; the parties already have title, and their common title is merely being divided. A partition segregates and terminates the common interests in a parcel of property, but it does not create or convey new or additional interests. The only result is that the common interests become interests in severalty.

This cause of action seeks a forced sale of the Cypress Property. Because you are not a co-tenant, co-owner, and hold no other present legal title interest in the Cypress Property, you have no standing to bring this claim and it also fails as a matter of law.

Given the above, we ask that you dismiss the Complaint with prejudice no later than **September 24, 2021**. Our deadline to respond to the Complaint on behalf of Sunil and Seema is Monday, September 27, 2021. If you need additional time to consider the contents of this letter please confirm your agreement to continue that deadline 30 days.

Of course, nothing contained herein shall be considered a waiver of our clients' rights, all of which are expressly reserved. If you have any legal authority to support conclusions other than as discussed above, please provide them at your earliest convenience. Thank you.

Best,



Zagros S. Bassirian

ZSB
Enclosures

Exhibit A

RECORDING REQUESTED BY

UNION LAND TITLE CO.

AND WHEN RECORDED MAIL THIS DEED AND UNLESS OTHERWISE SHOWN BELOW MAIL TAX STATEMENT TO

Name **GULAB I. & ZUBEIDA G. MOORJANI** 2192
Street Address **6323 CAMINITO DEL CERVATO**
City & State **SAN DIEGO CA 92111**

MAIL TAX STATEMENTS TO

Name **SAME AS ABOVE**
Street Address
City & State

TITLE ORDER NO. **74806-07** LECROW NO. **8591-BK**

DOC # **1992-0112303**
02-MAR-1992 08:00 AM

OFFICIAL RECORDS
SAN DIEGO COUNTY RECORDER'S OFFICE
ANNETTE EVANS, COUNTY RECORDER
RF: 4.00 FEES: 261.00
AF: 3.00 OC
MF: 1.00
TAX: 253.00

SPACE ABOVE THIS LINE FOR RECORDER'S USE

GRANT DEED

431-732-12-10

THE UNDERSIGNED GRANTOR(S) DECLARE(S)

DOCUMENTARY TRANSFER TAX IS \$ **253.00**
☒ computed on full value of property conveyed, or
☐ computed on full value less value of liens or encumbrances remaining at time of sale.
☐ unincorporated area
☒ city of **SAN DIEGO**, AND

FOR A VALUABLE CONSIDERATION, receipt of which is hereby acknowledged,
PAUL R. GREENBERG AND PAULA J. GREENBERG, HUSBAND AND WIFE

hereby GRANT(s) to
***GULAB I. MOORJANI AND ZUBEIDA G. MOORJANI, husband and wife, as joint tenants**

the following described real property in the **City of SAN DIEGO**
County of **SAN DIEGO**, State of California:
LIVING UNIT NO. 116, AN UNDIVIDED 1/16TH FRACTIONAL INTEREST IN AND TO LOT 28 OF UNIVERSITY CANYON, IN THE CITY OF SAN DIEGO, COUNTY OF SAN DIEGO, STATE OF CALIFORNIA, ACCORDING TO MAP THEREOF NO. 10694, FILED ON AUGUST 9, 1983, AS MORE PARTICULARLY DESCRIBED ON ATTACHED 'EXHIBIT A' AND BY THIS REFERENCE IS MADE A PART HEREOF.

Dated Feb. 12, 1992

STATE OF CALIFORNIA
COUNTY OF **SAN DIEGO**

On **FEBRUARY 13, 1992** before me, **BETTY J KOEPPEN**

PAUL R. GREENBERG AND PAULA J. GREENBERG, personally appeared

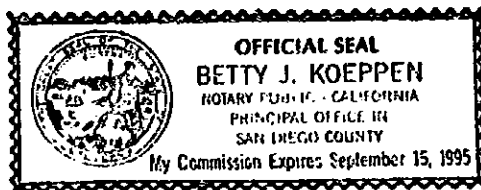
personally known to me (or proved to me on the basis of satisfactory evidence) to be the person(s) whose name(s) ~~are~~ subscribed to the within instrument and acknowledged to me that ~~they~~ they executed the same in ~~their~~ their authorized capacity(ies), and that by ~~their~~ their signature(s) on the instrument the person(s) or the entity upon behalf of which the person(s) acted, executed the instrument.

WITNESS my hand and official seal.

Signature

Betty J. Koeppe

Paul R. Greenberg
PAUL R. GREENBERG
Paula J. Greenberg
PAULA J. GREENBERG



(This area for official notarial seal)

GRANT DEED DATED FEB. 12, 1992

GRANTOR: GREENBERG
GRANTEE: MOORJANI

EXHIBIT A

A CONDOMINIUM COMPOSED OF:

PARCEL 1:

AN UNDIVIDED 1/16TH FRACTIONAL INTEREST IN AND TO LOT 28 OF UNIVERSITY CANYON, IN THE CITY OF SAN DIEGO, COUNTY OF SAN DIEGO, STATE OF CALIFORNIA, ACCORDING TO MAP THEREOF NO. 10694, FILED IN THE OFFICE OF THE COUNTY RECORDER OF SAN DIEGO COUNTY, CALIFORNIA, ON AUGUST 9, 1983.

EXCEPTING THEREFROM THE FOLLOWING:

ALL LIVING UNITS AS SHOWN UPON THE FIRST SUPERSEDING UNIVERSITY CANYON EAST PHASE 5 CONDOMINIUM PLAN RECORDED IN THE OFFICE OF THE COUNTY RECORDER OF SAN DIEGO COUNTY, CALIFORNIA, ON MAY 1, 1987, AS DOCUMENT NO. 87-239984.

AND RESERVING THEREFROM:

THE RIGHT TO POSSESSION OF ALL THOSE AREAS DESIGNATED AS YARD EXCLUSIVE USE AREA AS SHOWN UPON THE CONDOMINIUM PLAN REFERRED TO ABOVE.

PARCEL 2:

LIVING UNIT NO. 116 SHOWN UPON THE CONDOMINIUM PLAN REFERRED TO ABOVE.

PARCEL 3:

THE EXCLUSIVE RIGHT TO USE, POSSESSION AND OCCUPANCY OF THOSE PORTIONS OF PARCEL 1 DESCRIBED ABOVE, SHOWN AS YARD EXCLUSIVE USE AREAS WHICH BEAR THE SAME NUMBER AS THE LIVING UNIT DESCRIBED IN PARCEL 2 ABOVE AS SHOWN ON THE CONDOMINIUM PLAN REFERRED TO ABOVE, WHICH RIGHT IS APPURTENANT TO PARCELS 1 AND 2 ABOVE DESCRIBED.

PARCEL 4:

A NONEXCLUSIVE EASEMENT FOR INGRESS AND EGRESS OVER THE COMMON AREA OF PHASES 1 THROUGH 4 DESCRIBED IN THE DECLARATION OF RESTRICTIONS, WHICH EASEMENT IS APPURTENANT TO PARCELS 1, 2 AND 3 DESCRIBED ABOVE. THIS EASEMENT SHALL BECOME EFFECTIVE AS TO THE OTHER PHASES, RESPECTIVELY, UPON RECORDATION OF A DECLARATION OF ANNEXATION DECLARING SUCH OTHER PHASES, RESPECTIVELY, TO BE SUBJECT TO THE DECLARATION OF RESTRICTIONS WHICH REQUIRES THE OWNERS OF SAID PHASES, RESPECTIVELY, TO BE MEMBERS OF THE UNIVERSITY CANYON EAST HOMEOWNERS ASSOCIATION AND CONVEYANCE OF THE FIRST CONDOMINIUM IN EACH RESPECTIVE PHASE, ALL AS MORE FULLY SET FORTH IN THE DECLARATION OF RESTRICTIONS. THE COMMON AREA REFERRED TO HEREIN AS TO SUCH PHASE SHALL BE AS SHOWN AND DESCRIBED ON THE CONDOMINIUM PLAN COVERING EACH SUCH PHASE, RECORDED IN THE OFFICE OF THE COUNTY RECORDER OF SAN DIEGO COUNTY, CALIFORNIA, EXCEPTING THEREFROM ANY RESIDENTIAL BUILDINGS THEREON AND ANY PORTION THEREOF WHICH MAY BE DESIGNATED AS YARD EXCLUSIVE USE AREA.

PARCEL 5:

A NON-EXCLUSIVE EASEMENT ON AND OVER LOTS 27 AND 22 OF UNIVERSITY CANYON ACCORDING TO MAP THEREOF NO. 10694 FILED IN THE OFFICE OF THE COUNTY RECORDER OF SAN DIEGO COUNTY, CALIFORNIA ON AUGUST 9, 1983 AND DEFINED AS ASSOCIATION PROPERTY IN RECITAL F OF THE DECLARATION OF RESTRICTIONS, FOR ACCESS, USE, ENJOYMENT, INGRESS AND EGRESS OF THE AMENITIES LOCATED THEREON SUBJECT TO THE TERMS AND PROVISIONS OF THE DECLARATION OF RESTRICTIONS. THIS EASEMENT IS APPURTENANT TO ALL PARCELS DESCRIBED HEREIN. THE ASSOCIATION PROPERTY IS FOR THE USE OF OWNERS OF CONDOMINIUMS WHICH ARE SUBJECT TO THE DECLARATION OF RESTRICTIONS AND IS NOT FOR THE USE OF THE GENERAL PUBLIC. THIS EASEMENT SHALL BECOME EFFECTIVE UPON THE CONVEYANCE OF LOTS 27 AND 22, RESPECTIVELY, TO THE UNIVERSITY CANYON EACH HOMEOWNERS ASSOCIATION.

OFFICIAL RECORDS, AMELIE J. EVANS, SAN DIEGO COUNTY RECORDER

Exhibit B

RECORDING REQUESTED BY

DOC # 1999-0690144

Oct 13, 1999 9:21 AM

AND WHEN RECORDED MAIL THIS DEED AND, UNLESS OTHERWISE SHOWN BELOW, MAIL TAX STATEMENT TO:

Name GULAB I. & ZUBEIDA G. &
Street SUNIL G. MOORJANI
Address
City & State 6323 CAMINITO DEL CERVATO
Zip SAN DIEGO
CA 92111-6854
Title Order No. Escrow No.

OFFICIAL RECORDS
SAN DIEGO COUNTY RECORDER'S OFFICE
GREGORY J. SMITH, COUNTY RECORDER

FEES: 10.00
OC: OC

2000



1999-0690144

SPACE ABOVE TH

T 360 LEGAL (1-94)

Quitclaim Deed

THE UNDERSIGNED GRANTOR(S) DECLARE(S)

0 DOLLARS GIFT

DOCUMENTARY TRANSFER TAX IS \$ NONE-FAMILY TRANSFER

☐ unincorporated area ☒ City of SAN DIEGO

Parcel No. 431-732-12-10

☐ computed on full value of property conveyed, or

☐ computed on full value less value of liens or encumbrances remaining at time of sale, and

FOR A VALUABLE CONSIDERATION, receipt of which is hereby acknowledged,
GULAB I. MOORJANI AND ZUBEIDA G. MOORJANI, husband and wife,

hereby REMISE, RELEASE AND FOREVER QUITCLAIM to

GULAB I. MOORJANI AND ZUBEIDA G. MOORJANI, husband and wife,
AND SUNIL G. MOORJANI, single man, ALL AS JOINT TENANTS.

the following described real property in the city of San Diego,
county of San Diego, state of California:

LIVING UNIT NO. 116, AN UNDIVIDED 1/16TH FRACTIONAL INTEREST
IN AND TO LOT 28 OF UNIVERSITY CANYON, IN THE CITY OF SAN
DIEGO, COUNTY OF SAN DIEGO, STATE OF CALIFORNIA, ACCORDING
TO MAP THEREOF NO. 10694, FILED ON AUGUST 9, 1983, AS MORE
PARTICULARLY DESCRIBED ON ATTACHED "EXHIBIT A" AND BY THIS
REFERENCE IS MADE A PART HEREOF.

Dated October 6, 1999

STATE OF ~~CALIFORNIA~~ OHIO
COUNTY OF WOOD } S.S.

On Oct. 6, 1999

before me,

GULAB I. MOORJANI + ZUBEIDA G. MOORJANI
a Notary Public in and for said County and State, personally appeared

personally known to me (or proved to me on the basis of satisfactory evidence) to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

WITNESS my hand and official seal

Signature

JUDITH C. WHITNER
Notary Public - State of Ohio
My Commission Expires 9-25-02

(This area for official notarial seal)

MAIL TAX STATEMENTS TO PARTY SHOWN ON FOLLOWING LINE; IF NO PARTY SHOWN, MAIL AS DIRECTED ABOVE

Name

Street Address

City & State

A CONDOMINIUM COMPOSED OF:

PARCEL 1:

AN UNDIVIDED 1/16TH FRACTIONAL INTEREST IN AND TO LOT 28 OF UNIVERSITY CANYON, IN THE CITY OF SAN DIEGO, COUNTY OF SAN DIEGO, STATE OF CALIFORNIA, ACCORDING TO MAP THEREOF NO. 10694, FILED IN THE OFFICE OF THE COUNTY RECORDER OF SAN DIEGO COUNTY, CALIFORNIA, ON AUGUST 9, 1983.

EXCEPTING THEREFROM THE FOLLOWING:

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AND RESERVING THEREFROM:

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PARCEL 2:

LIVING UNIT NO. 116 SHOWN UPON THE CONDOMINIUM PLAN REFERRED TO ABOVE.

PARCEL 3:

THE EXCLUSIVE RIGHT TO USE, POSSESSION AND OCCUPANCY OF THOSE PORTIONS OF PARCEL 1 DESCRIBED ABOVE, SHOWN AS YARD EXCLUSIVE USE AREAS WHICH BEAR THE SAME NUMBER AS THE LIVING UNIT DESCRIBED IN PARCEL 2 ABOVE AS SHOWN ON THE CONDOMINIUM PLAN REFERRED TO ABOVE, WHICH RIGHT IS APPURTENANT TO PARCELS 1 AND 2 ABOVE DESCRIBED.

PARCEL 4:

A NONEXCLUSIVE EASEMENT FOR INGRESS AND EGRESS OVER THE COMMON AREA OF PHASES 1 THROUGH 4 DESCRIBED IN THE DECLARATION OF RESTRICTIONS, WHICH EASEMENT IS APPURTENANT TO PARCELS 1, 2 AND 3 DESCRIBED ABOVE. THIS EASEMENT SHALL BECOME EFFECTIVE AS TO THE OTHER PHASES, RESPECTIVELY, UPON RECORDATION OF A DECLARATION OF ANNEXATION DECLARING SUCH OTHER PHASES, RESPECTIVELY, TO BE SUBJECT TO THE DECLARATION OF RESTRICTIONS WHICH REQUIRES THE OWNERS OF SAID PHASES, RESPECTIVELY, TO BE MEMBERS OF THE UNIVERSITY CANYON EAST HOMEOWNERS ASSOCIATION AND CONVEYANCE OF THE FIRST CONDOMINIUM IN EACH RESPECTIVE PHASE, ALL AS MORE FULLY SET FORTH IN THE DECLARATION OF RESTRICTIONS. THE COMMON AREA REFERRED TO HEREIN AS TO SUCH PHASE SHALL BE AS SHOWN AND DESCRIBED ON THE CONDOMINIUM PLAN COVERING EACH SUCH PHASE, RECORDED IN THE OFFICE OF THE COUNTY RECORDER OF SAN DIEGO COUNTY, CALIFORNIA, EXCEPTING THEREFROM ANY RESIDENTIAL BUILDINGS THEREON AND ANY PORTION THEREOF WHICH MAY BE DESIGNATED AS YARD EXCLUSIVE USE AREA.

PARCEL 5:

A NON-EXCLUSIVE EASEMENT ON AND OVER LOTS 27 AND 22 OF UNIVERSITY CANYON ACCORDING TO MAP THEREOF NO. 10694 FILED IN THE OFFICE OF THE COUNTY RECORDER OF SAN DIEGO COUNTY, CALIFORNIA ON AUGUST 9, 1983 AND DEFINED AS ASSOCIATION PROPERTY IN RECITAL F OF THE DECLARATION OF RESTRICTIONS, FOR ACCESS, USE, ENJOYMENT, INGRESS AND EGRESS OF THE AMENITIES LOCATED THEREON SUBJECT TO THE TERMS AND PROVISIONS OF THE DECLARATION OF RESTRICTIONS. THIS EASEMENT IS APPURTENANT TO ALL PARCELS DESCRIBED HEREIN. THE ASSOCIATION PROPERTY IS FOR THE USE OF OWNERS OF CONDOMINIUMS WHICH ARE SUBJECT TO THE DECLARATION OF RESTRICTIONS AND IS NOT FOR THE USE OF THE GENERAL PUBLIC. THIS EASEMENT SHALL BECOME EFFECTIVE UPON THE CONVEYANCE OF LOTS 27 AND 22, RESPECTIVELY, TO THE UNIVERSITY CANYON EACH HOMEOWNERS ASSOCIATION.

Exhibit C



SEP 25, 2008 4:57 PM

OFFICIAL RECORDS
SAN DIEGO COUNTY RECORDER'S OFFICE
GREGORY J. SMITH, COUNTY RECORDER
FEES: 852.40
OC: OC

PAGES: 2



8895

SPACE ABOVE THIS LINE IS FOR RECORDER'S USE
GRANT DEED

RECORDING REQUESTED BY:
FIDELITY NATIONAL TITLE

AND WHEN RECORDED MAIL TO:
Seema & Sunil Moorjani
11881 Cypress Valley Drive
San Diego, CA 92131

Order No.: 406040-6
Escrow No.: SP-01538-AH
A.P.N.: 319-710-25-00

THE UNDERSIGNED GRANTOR(S) DECLARE(S)
DOCUMENTARY TRANSFER TAX IS \$840.40

CITY TRANSFER TAX IS \$.00

- [X] computed on full value of property conveyed, or
 [] computed on full value less value of liens or encumbrances remaining at time of sale.
 [] unincorporated area [X] City of San Diego AND

FOR A VALUABLE CONSIDERATION, receipt of which is hereby acknowledged,

Nyle S. Marmion, Trustee and Debra M. Marmion, Trustee of The Marmion Trust dated July 10, 2003
hereby GRANT(S) to

Seema Moorjani and Sunil Moorjani, wife and husband as community property with right of survivorship

the following described real property in the County of San Diego, State of California:

See Exhibit "A" attached hereto and made a part hereof for complete legal description.

Dated: September 15, 2008

STATE OF CALIFORNIA
COUNTY OF San Diego } ss.

On 24 Sept 2008 before me
L. Kerby
 Notary Public, personally appeared
Nyle S. Marmion and
Debra M. Marmion

The Marmion Trust dated July 10, 2003

By: Nyle S. Marmion, Trustee

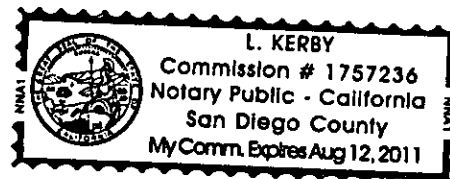
By: Debra M. Marmion, Trustee

who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies) and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s), acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature [Signature]
 Signature of Notary
 Commission Expiration Date: Aug 12-2011



(This area for official notarial seal)

MAIL TAX STATEMENTS TO: SAME AS ABOVE

2
8896

Order No. 08-4060406

LEGAL DESCRIPTION

EXHIBIT "ONE"

THE LAND REFERRED TO HEREIN BELOW IS SITUATED IN THE CITY OF SAN DIEGO, COUNTY OF SAN DIEGO, STATE OF CALIFORNIA, AND IS DESCRIBED AS FOLLOWS:

Lot 56 of Cypress Valley Unit No. 1, in the City of San Diego, County of San Diego, State of California, according to Map thereof No. 13558, filed in the Office of the County Recorder of San Diego County, April 8, 1998.

Assessor's Parcel No: 319-710-25

Exhibit D



RECORDING REQUESTED BY

4325

DEC 31, 2008 11:43 AM

OFFICIAL RECORDS
 SAN DIEGO COUNTY RECORDER'S OFFICE
 DAVID L. BUTLER, COUNTY RECORDER
 FEES: 12.00
 DC: DC

PAGES: 2

WHEN RECORDED MAIL TO
 AND MAIL TAX STATEMENTS TO
 NAME SEEMA & SUNIL G. & GULABI. &
ZUBEIDA G MOORJANI
 ADDRESS 11881 CYPRESS VALLEY DRIVE
 CITY SAN DIEGO
 STATE & ZIP CA 92131
 TITLE ORDER NO. 406040-6

ESCROW OR LOAN NO.

SP-01538-AH

APN NO.

319-710-25

QUITCLAIM DEED

THE UNDERSIGNED GRANTOR(S) DECLARE(S)

GIFT- FAMILY TRANSFER

DOCUMENTARY TRANSFER TAX is \$ NONE (\$0) CITY TAX \$ 0

☐ computed on full value of property conveyed, or ☐ computed on full value less value of liens or
 encumbrances remaining at time of sale,

☐ Unincorporated area: ☒ City of SAN DIEGO, and

FOR A VALUABLE CONSIDERATION, receipt of which is hereby acknowledged, SEEMA & SUNIL G. MOORJANI,
HUSBAND AND WIFE,
 hereby remise, release and forever quitclaim to SEEMA & SUNIL G. MOORJANI, HUSBAND AND WIFE, AND
GULABI. AND ZUBEIDA G. MOORJANI, HUSBAND AND WIFE, ALL AS JOINT TENANTS, State of California:
 the following described real property in the County of SAN DIEGO

AN UNDIVIDED EQUAL INTEREST, IN THE CITY OF SAN DIEGO, COUNTY OF SAN DIEGO,
STATE OF CALIFORNIA, AS MORE PARTICULARLY DESCRIBED AS ATTACHED "EXHIBIT A"
AND MADE A PART HEREOF FOR COMPLETE LEGAL DESCRIPTION.

Dated 12/31/08Seema MoorjaniSunil MoorjaniSeema MoorjaniSUNIL MOORJANI

STATE OF CALIFORNIA San Diego
 COUNTY OF San Diego) SS

On December 31, 2008 before me, Christine J. Seliger, Notary Public (here
 insert name and title of the officer), personally appeared Sunil Moorjani and Seema Moorjani

who
 proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) are subscribed to the within instrument, and acknowledged to me that
 he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s) or the entity upon
 behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature

Christine J. Seliger

LEGAL DESCRIPTION**4326****EXHIBIT ~~ONE~~ "A"**

THE LAND REFERRED TO HEREIN BELOW IS SITUATED IN THE CITY OF SAN DIEGO, COUNTY OF SAN DIEGO, STATE OF CALIFORNIA, AND IS DESCRIBED AS FOLLOWS:

Lot 56 of Cypress Valley Unit No. 1, in the City of San Diego, County of San Diego, State of California, according to Map thereof No. 13558, filed in the Office of the County Recorder of San Diego County, April 8, 1998.

Assessor's Parcel No: 319-710-25